

1015 Brookwood Road
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May 10, 1999

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Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, Maryland 20852

In re: Docket No. 98N-1038, Irradiation in the Production, Processing, and Handling of Food

To whom it may concern:

I support the following recommendation by the Center for Science in the Public Interest regarding labeling of irradiated foods:

"any foods, or any foods containing ingredients, that have been treated by irradiation, should be labeled with a written statement on the principal display panel indicating such treatment. The statement should be easy to read and placed in close proximity to the name of the food and accompanied by the international symbol. If the food is unpackaged, this information should be clearly displayed on a poster in plain view and adjacent to where the product is displayed for sale."

Like other labels, irradiation labels are required by the FDA to be truthful and not misleading. I believe that the terms "treated with radiation" or "treated by irradiation" should be retained. Any phrase involving the word "pasteurization" is misleading because pasteurization is an entirely different process of rapid heating and cooling.

I recognize the *radura* symbol as information regarding a material fact of food processing. The requirement for irradiation disclosure (both label and *radura*) should not expire at any time in the future. The material fact of processing remains. Even if some consumers become familiar with the *radura*, new consumers (e.g., young people, immigrants) will not be. The symbol should be clearly understandable at the point of purchase for everyone. If there is no label, consumers will be misled into believing the food has not been irradiated.

I urge you to extend the comment period past its current end date of May 18 to allow more concerned citizens the time to write in about this issue. Also, please place the comments received on the Internet so that the public can be informed about who is participating in this comment process and can have a sense of public sentiment.

Yours truly,



Stephen P. Kunz

98N-1038

EXT 23



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